

School Administrators Guide to Maine's New High School

Graduation rate Calculations

NCLB Graduation Rate

Beginning with the 2009/10 school year, Maine will be using the new NCLB (No Child Left Behind) graduation rate formula to calculate graduation rate for the 2008/09 school year. The intent of this regulation is to standardize methodologies across states and to provide more consistency in reporting and comparisons across states.

A state must calculate a “four-year adjusted cohort graduation rate,” defined as the number of students who graduate in four years with a regular high school diploma divided by the number of students that form the adjusted cohort for that graduating class.

For those high schools that start after grade nine, the cohort must be calculated based on the earliest high school grade. The term “adjusted cohort” means the students who enter grade 9 (or the earliest high school grade) and any students who transfer into the cohort in grades 9 through 12 minus any students removed from the cohort.

The term “students who transfer into the cohort” means the students who enroll after the beginning of the entering cohort's first year in high school, up to and including in grade 12. To remove a student from the cohort, a school or LEA must confirm in writing that the student transferred out, immigrated to another country, or is deceased. To confirm that a student transferred out, the school or LEA must have official written documentation that the student enrolled in another school or in an educational program that culminates in the award of a regular high school diploma.

A student who is retained in grade, enrolls in a General Educational Development (GED) program, or leaves school for any other reason may not be counted as having transferred out for the purpose of calculating graduation rate and must remain in the adjusted cohort.

The term “students who graduate in four years” means students who earn a regular high school diploma at the conclusion of their fourth year, before the conclusion of their fourth year, or during a summer session immediately following their fourth year.

The term “regular high school diploma” means the standard high school diploma that is awarded to students in the State and that is fully aligned with the State's academic content standards or a higher diploma and does not include a GED credential, certificate of attendance, or any alternative award.

Is the four-year graduation rate identical to the graduation rate recommended by the National Governors Association Task Force (i.e., the “NGA rate”)?

The four-year NCLB graduation rate is similar but not identical to the NGA rate. The NGA rate permits special education students and recent immigrant students with limited English proficiency (LEP) to be assigned to different cohorts to allow them more time to graduate, while the four-year graduation rate does not allow for such “cohort reassignment.” The NGA rate also permits students who graduate with modified high school diplomas to count as graduates, while the four-year graduation rate strictly adheres to section 1111(b)(2)(C)(vi) of the ESEA, which defines graduation rate as the “percentage of students who graduate from secondary school with a regular diploma in the standard number of years” (emphasis added). The legislative history accompanying this provision suggests that Congress intended a “regular diploma” to exclude an alternative degree that is not fully aligned with a State’s academic standards (e.g., a General Education Development (GED) credential, a modified diploma, and a certificate of attendance).

In addition to the NCLB graduation rate, Maine will calculate “extended-year adjusted cohort NGA graduation rates.” An extended-year adjusted cohort NGA graduation rate is defined as the number of students who graduate in five or six years with a regular high school diploma divided by the number of students who form the adjusted cohort for the five-year adjusted cohort or the six-year adjusted cohort graduation rate, provided that the adjustments account for any students who transfer into the cohort by the end of the year of graduation being considered minus the number of students who transfer out, emigrate to another country, or are deceased by the end of that year. These students must also have been previously designated as a 5-year cohort or a six year cohort. This designation must also have been assigned to the student while in grade 9. After the completion of the grade 9 school year, adjusting the student’s cohort is no longer permitted.

How is the four-year graduation rate calculated?

The four-year graduation rate is calculated by dividing the number of students who graduate in four years or less with a regular high school diploma by the number of students who form the adjusted cohort for that graduating class.

The following formula provides an example of the four-year graduation rate for the cohort entering 9th grade for the first time in the fall of the school year and graduating by the end of the school year four years later.

$$\left[\frac{\text{On-time graduates by year } x}{[(\text{first time 9}^{\text{th}} \text{ graders in year } x-4) + (\text{Transfers-In}) - (\text{Transfers-Out})]} \right] \times 100$$

Why must States base the four-year graduation rate on “first-time in 9th grade” cohorts?

Cohort-based graduation rates are accurate only if each student is assigned to a single cohort. For example, without a single cohort assignment, a student who repeated 9th grade might be included in two separate cohorts of 9th graders—the class in which the student originally started 9th grade and the class in which the student was assigned for his or her second year of 9th grade. Unless the student skipped a grade later in high school or caught up with the original cohort in some other manner, that student would not graduate within four years of starting 9th grade. Therefore, to ensure an accurate measure of a four-year graduation rate, the cohort must be based only on students who are first-time 9th graders.

Does the four-year graduation rate include a student who graduates from high school in less than four years?

Yes. The four-year graduation rate counts a student who graduates with a regular high school diploma in four years or less as a high school graduate in his or her original cohort—that is, the cohort with which he or she started 9th grade. For example, a student who enters the 9th grade for the first time in the 2011-2012 school year and graduates in three years would be included in the cohort of students expected to graduate in the 2014-2015 school year, even though that student would receive his or her diploma in the 2013-2014 school year. The student may be included only in the graduation rate calculated for the cohort of students who started 9th grade in 2011-2012; effectively, the student’s graduation information is “banked” for a year until his or her cohort graduates in 2014-2015. Thus, the numerator in the graduation rate calculation includes only members of the cohort that graduate in a particular year, not other students who may also graduate that year.

May the four-year graduation rate include students who graduate in the summer after their fourth year of high school?

Maine will include students who graduate in the summer after their fourth year of high school among the cohort members who graduate in four years. However, the inclusion of such students in the four-year graduation rate may not delay annual AYP determinations. In order not to delay those determinations, a State that includes summer school graduates typically “lags” graduation rates for AYP determinations. For example, such a State would announce AYP determinations for the 2011-2012 school year prior to the start of the 2012-2013 school year using assessment results from the 2011-2012 school year and the graduation

rate from the 2010-2011 school year (which includes students who graduated in summer 2011). Lagging graduation rate in this manner may provide a State with a more complete picture of the on-time graduation rate, while also allowing additional time to review and ensure the accuracy of graduation rate data without delaying annual AYP determinations.

The following formula provides an example of the four-year graduation rate for the cohort entering 9th grade for the first time in the fall of the 2007-2008 school year and graduating by the end of summer 2011. Maine will be using the following formula:

$$\frac{\text{Number of cohort members who earned a regular high school diploma through summer 2011}}{\text{Number of first-time 9th graders in fall 2007 (starting cohort) plus students who transfer in, minus students who transfer out, emigrate, or die during school years 2007-2008, 2008-2009, 2009-2010, 2010-2011, and through summer 2011}}$$

How is an adjusted cohort graduation rate calculated for a high school that does not have each of grades 9-12?

The cohort assigned to a student follows the student. If a student enters grade 9 for the first time in the fall of the 2009-10 school year and then moved to a new district in the summer of 2010, the school where the student attends for grade 10 in the fall of the 2010-11 school year will keep the same cohort year of 2013-14. This student is counted as a transfer-in for the later school and a transfer-out for the original school.

If a student drops out before entering 9th grade, is the student included in the four-year graduation rate?

No. In order to be included in the four-year graduation rate at the school level, a student must be enrolled as a first-time 9th grader.

If a student changes subgroup membership by the end of high school, how would that student be counted in the four-year graduation rate?

In some cases, a student who is part of one subgroup as a 9th grader may no longer be part of that subgroup as a 12th grader (e.g., a student might be LEP upon entering high school, but designated proficient in English by the end of high school). Maine will count the student in the subgroup at the time of graduation.

How is a student who graduates in more than four years counted in the four-year graduation rate?

A student who graduates in more than four years is counted as a non-graduate in the four-year graduation rate. Such a student must be included in the denominator of the four-year graduation rate and may not be

included in the numerator because the student did not graduate in four years or less with a regular high school diploma. The student may not be removed from the cohort or assigned to a different cohort when calculating the four-year graduation rate. However, such a student may be counted as a graduate in the extended-year NGA graduation rate if the student meets the conditions to do so.

How is a student with a disability who has an individualized education program (IEP) that includes a plan to complete graduation requirements in more than four years included in the four-year graduation rate?

Only students who graduate with a regular high school diploma in four years or less may be included in the numerator of the four-year graduation rate. Thus, a student who takes more than four years to graduate, regardless of the reason, must be included in the adjusted cohort for the four-year graduation rate (the denominator) but may not be counted as a graduate (the numerator) when calculating the four-year graduation rate. However, as explained previously, a student with a disability who graduates with a regular high school diploma in more than four years may be included in an extended-year NGA graduation rate if the student meets the conditions to do so.

A student with a disability who does not graduate with a regular high school diploma, but instead receives an alternative diploma, certificate of completion, or any other degree or certificate that is not fully aligned with the State's academic content standards may not be counted as graduating in calculating either the four-year or extended-year graduation rate.

Extended-year adjusted cohort graduation rate definition.

May a State include students who graduate in more than four years with a regular high school diploma in graduation rate calculations?

Yes. Maine will use an "extended-year adjusted cohort NGA graduation rate" (hereafter referred to as the "extended-year graduation rate") in AYP determinations that takes into account students who graduate with a regular high school diploma in more than four years. The option to use an extended-year adjusted cohort graduation rate in AYP determinations gives schools and LEAs credit for successfully graduating students who take longer than four years to graduate high school with a regular high school diploma.

What is an extended-year adjusted cohort graduation rate?

An extended-year adjusted cohort graduation rate is defined as the number of students who graduate in four years or more with a regular high school diploma divided by the number of students who form the adjusted cohort for the four-year graduation rate, provided that the adjustments add to the cohort all students who transfer into the cohort by the end of the year of graduation being considered and subtract students who

transfer out, emigrate to another country, or are deceased by the end of that year. An extended-year graduation rate follows the same rules as the four-year graduation rate. The following formula shows an example of the calculation of a five-year adjusted cohort graduation rate based on the class entering 9th grade in fall 2007 and graduating five years later at the end of the 2011-2012 school year.

Numerator in the four-year adjusted cohort graduation rate plus the number of students from the cohort who earned a regular high school diploma by the end of the 2011-2012 school year

Denominator in the four-year adjusted cohort graduation rate plus students who transferred in during the 2011-2012 school year minus students who transferred out, emigrated, or died during the 2011-2012 school year

If a State uses an extended-year graduation rate, must it use the rate consistently across the State for reporting and AYP determinations?

Yes. A State's four-year graduation rate and any extended-year graduation rate it elects to use must be clearly defined and calculated consistently across all high schools, and LEAs in the State for purposes of both reporting and making AYP determinations. A State may choose to calculate a graduation rate that differs from the requirements for other local and State purposes, but only the four-year graduation rate and any extended-year graduation rate approved by the Secretary may be used to meet the Title I accountability requirements.

How is a cohort "adjusted"?

The four-year graduation rate follows a cohort, or a group of students, who begin as first-time 9th graders in a particular school year and who graduate with a regular high school diploma in four years or less. An extended-year graduation rate follows the same cohort of students for an additional year or years. The cohort is "adjusted" by adding any students transferring into the cohort and by subtracting any students who transfer out, emigrate to another country, or die during the years covered by the rate.

Which students may be "removed from a cohort"?

Only a student who transfers out and enrolls in another school or in an educational program that culminates in the award of a regular high school diploma, emigrates to another country, or dies may be removed from a high school's or LEA's cohort. "Removing a student from his or her cohort" means removing the student from the denominator of the graduation rate equation. Before removing a student from a cohort, a school or LEA must obtain confirmation in writing that the student transferred out, emigrated, or is deceased. No other students may be removed from the cohort. Thus, schools and LEAs must ensure that a student who drops out of high school is not deemed a transfer for purposes of calculating graduation rate; rather, the student must remain in the adjusted cohort—that is, the denominator of the graduation rate calculation. The 2008 Title I

regulations do not require a State to track and report on the drop out rate, although data on drop outs is collected by the Department of Education independently of these requirements

What is the definition of a “transfer”?

A transfer into a cohort occurs when a student enrolls after the beginning of the entering cohort’s first year in high school, up to and including in grade 12. A transfer out of a cohort occurs when a student leaves a school and enrolls in another school or in an educational program that culminates in the award of a regular high school diploma. A student who is retained in grade, enrolls in a GED program, or leaves school for any other reason may not be counted in the four-year or extended-year graduation rate as a transfer and must remain in the adjusted cohort (i.e., must be included in the denominator of the graduation rate for that cohort).

When a student transfers into a school, to which cohort should a school or LEA assign the student?

A student who transfers into a school should be assigned to the cohort in which the student started 9th grade for the first time. This information should be easily obtained for the vast majority of students who transfer into a school. In the State of Maine, Infinite Campus / MEDMS will provide this information for students who transfer between schools within the State. Schools and LEAs should make every effort to obtain this information for students who transfer from another State or another country.

If a student who has repeated a grade transfers into a school, the student should be assigned to the cohort in which the student started 9th grade for the first time. This assignment prevents the student from being included in two separate cohorts of 9th graders—the cohort in which the student originally started 9th grade and the cohort in which the student was assigned in the school to which he or she transferred. Unless the student skipped a grade later in high school or caught up with the original cohort in some other manner, that student could not graduate within four years of starting 9th grade.

If a student re-enrolls in a public high school after having dropped out of school for a period of time, how may a school or LEA count that student in the four-year or extended-year graduation rate?

The adjusted cohort graduation rate requires a State to have in place an accurate student record system that can track the progress of individual students over time. This system must record when a student has dropped out of school (and may not count him or her as a student who has transferred out). If, for example, a student who was a first-time 9th grader in 2008-2009 drops out in 2009-2010 after tenth grade, and then re-enrolls in high school in 2011-2012, that student may be deemed to have transferred into the receiving school and should be assigned to the cohort in which the student was a member when he or she started 9th grade for the first time (2008-2009).

Unless the student skipped a grade later in high school or caught up with the original cohort in some other manner, that student could not graduate within four years of starting 9th grade, and therefore would count as a non-graduate in the four-year graduation rate. However, if the student graduates in more than four years, he or she may be counted as a graduate, in an extended-year graduation rate, if the student meets the requirements. As long as the student re-enrolls before the State determines the four-year graduation rate for that student's cohort, the student would no longer be recorded as a drop out and the student record system should be adjusted accordingly.

May a school or LEA consider a student to be a transfer if the student leaves a public high school and enrolls in a private school?

Yes. If a student leaves a public high school to enroll in a private school, that student would be considered to be a transfer out.

May a school or LEA consider a student to be a transfer if the student leaves a public high school to be home schooled?

Yes. A student who leaves a public high school to be home schooled would be considered to be a transfer if the home school meets the State's requirements for compulsory attendance and other laws or policies applicable to home schools.

May a school or LEA consider a student to be a transfer if the student leaves a public high school and enrolls in another educational program?

A student who leaves a public high school and enrolls in another educational program may be considered a transfer only if that educational program culminates in the award of a regular high school diploma. For instance, if a student leaves a public high school because the student is placed in a juvenile detention center, the student would be a transfer if the center provides and the student participates in an educational program that culminates in the award of a regular high school diploma. Otherwise, the student may not be considered a transfer and must remain in the adjusted cohort for purposes of calculating the four-year and extended-year graduation rate.

Why is written confirmation required before a student may be removed from a cohort?

It is critical for a school or LEA to have written confirmation that a student has transferred, emigrated to another country, or died before a student is removed from a cohort. Written documentation facilitates audits and, thus, will help ensure that States, LEAs, and schools have an accurate measure of graduation rate. Unless a school or LEA can confirm in writing that a student has transferred out, emigrated to another country, or is deceased, the school or LEA must consider that student to be in the adjusted cohort for purposes of calculating the four-year or extended-year graduation rate.

What documentation is required to confirm that a student has transferred out--i.e., transferred to another school or to an educational program that culminates in the award of a regular high school diploma?

To confirm that a student transferred out, a school or LEA must have “official written documentation” that a student has transferred to another school or to an educational program that culminates in the award of a regular high school diploma. In the case of a student who moves to another public school within the State, that transfer would most likely be officially documented and recorded in the State’s data system; thus, a record from the State’s data system would be considered official written documentation. Other examples of official written documentation include: a request for student records from a receiving public or private high school or an educational program (that culminates in a regular high school diploma); or a written record of a response from an official in the receiving school or program acknowledging the student’s enrollment. With respect to a home schooled student, official written documentation may include, for example, a letter of withdrawal or other written confirmation from the parent or guardian; any documentation that meets the home school notification or compulsory attendance requirements in the State; or any other written documentation accepted in the State to verify a child is home schooled. A conversation with a parent or neighbor of a student, for instance, would not be considered official written documentation of a transfer.

What documentation is required to confirm that a student has emigrated to another country?

A school or LEA must have written confirmation that a student has emigrated to another country, but need not obtain official written documentation. For example, if a parent informs a school administrator that the family is leaving the country, the school administrator may document this conversation in writing and include it in the student’s file. The regulations do not require written documentation to be “official” for a student who emigrates to another country because the Department recognizes that it may be difficult, if not impossible, to obtain transcripts or other official documentation from another country confirming that the student is enrolled in school.

What documentation is required to confirm that a student is deceased?

A school or LEA must have written confirmation that a student is deceased before removing the student from the cohort. A letter from a parent or an obituary is sufficient documentation. Official written documentation of a student’s death, such as a death certificate, is not necessary.

How can an LEA document the transfer of a migrant student?

The Department’s Migrant Student Information Exchange system includes information on migrant students that can be accessed by all States and LEAs to help ensure that the academic records of these highly mobile students are preserved during their frequent moves. This system should be of great assistance to States in

documenting the enrollment of migratory students, as defined in section 1309 of the ESEA, in another school or in an educational program that culminates in the award of a regular high school diploma.

Is a student who leaves school because the student is incarcerated considered a transfer?

An incarcerated student may be considered a transfer only if the prison or juvenile facility to which the student is confined has a school (as defined under State law) or provides an educational program that culminates in the award of a regular high school diploma. If the facility does not have a school or educational program, or provides an educational program that does not culminate in the award of a regular high school diploma, the student may not be considered a transfer, may not be removed from the cohort, and must remain in the denominator of the graduation rate calculation for the school, LEA, and State in which the student last attended high school.

If, after multiple attempts, an LEA cannot obtain official written documentation that a student has transferred out, may the LEA remove the student from the cohort?

No. Although in some cases it may be difficult for an LEA to obtain official written documentation of a student's transfer, the student may not be removed from the cohort simply because the student's status cannot be documented. Removing a student from the cohort whose status cannot be documented could produce an inaccurate graduation rate if that student dropped out of school rather than transferred. It is critical that an LEA carefully document student transfers and accurately calculate the four-year graduation rate in order to (a) give parents and the public accurate information about the success of a school, LEA, and State in graduating students and (b) ensure that AYP determinations are based on valid graduation rate calculations.

How is a "regular high school diploma" defined?

A "regular high school diploma" means the standard high school diploma awarded to students in a State that is fully aligned with the State's academic content standards and does not include a GED credential, certificate of attendance, or any alternative award. The term "regular high school diploma" also includes a "higher diploma" that is awarded to students who complete requirements above and beyond what is required for a regular diploma.

May a GED, alternative diploma, or certificate of attendance be counted as a regular high school diploma?

No. Alternative graduation credentials that are not fully aligned with a State's academic content standards may not be counted as a regular high school diploma for the purpose of calculating the four-year or extended-year graduation rate. Thus, students who graduate with a credential other than a regular high school diploma, such as a GED, modified diploma, or certificate of attendance, may not be included in the numerator, but must be included in the denominator of the four-year and extended-year graduation rate.

Must an LEA report a graduation rate for each of its high schools?

Yes. An LEA must report a graduation rate in the aggregate and disaggregated by subgroups, for any school with a graduating cohort unless doing so would reveal personally identifiable information (i.e., unless the number of students is below the State's minimum group size for reporting purposes).

May a State "lag" its graduation rate data to include summer graduates in its four-year or extended-year graduation rate?

Yes. As previously explained, a State may lag its graduation rate data in order to include summer graduates in AYP determinations. Using lagged graduation rate data in AYP determinations means that the four-year graduation data from the previous academic year will be used in AYP determinations with the assessment results and participation rate for the current academic year. Lagging data is permitted for both the four-year and extended-year graduation rates.

A State's desire to lag data is not a sufficient reason to extend the 2010-2011 deadline to report the four-year graduation rate. A State must report the four-year graduation rate for 2010-2011 and use that rate in AYP determinations for 2011-2012, regardless of whether the State can use lagged data in calculating its four-year or extended-year graduation rate.

If a State intends to lag its graduation rate data in AYP determinations, the State must amend its Accountability Workbook for approval by the Secretary. The State should include in its request a description of how the State will handle the transition to the lagged four-year or extended-year graduation rate, including whether the State will use the same year's graduation data to make AYP determinations for two consecutive years. Once employed, lagging should be used consistently throughout the State and over time.

States and LEAs that lag their graduation rate data in AYP determinations should be clear about this practice on their report cards. For example, the State and LEA should explain on their report cards that the previous school year's graduation rate data are used in the current school year's AYP determination in order to include summer graduates.

How may a State include an extended-year graduation rate in its AYP determinations?

The Department anticipates that States will propose a number of ways to include an extended-year graduation rate in their AYP determinations. If a State chooses to use an extended-year graduation rate, the AYP calculation would include different cohorts of students. For example, if a State were to use a five-year graduation rate as part of its AYP determination, the State would base its AYP determinations in 2011-2012 on the four-year adjusted cohort that started 9th grade in 2008-2009 and the five-year adjusted cohort that started in 9th grade in 2007-2008. The table below presents this example.

Four-year and extended-year graduation rates included in AYP determinations based on assessments administered in 2011-2012			
Rate	First-time 9th graders	Cohort population	Regular high school diploma recipients
Four-year graduation rate	2008-2009	First-time 9th graders in 2008-2009 plus all students who transfer into the cohort minus students who transfer out, emigrate, or die by the end of the 2011-2012 school year	All students in the cohort population who receive a regular high school diploma in four years or less by the end of the 2011-2012 school year
Five-year graduation rate	2007-2008	First-time 9th graders in 2007-2008 plus all students who transfer into the cohort minus students who transfer out, emigrate, or die by the end of the 2011-2012 school year	All students in the cohort population who receive a regular high school diploma in five years or less by the end of the 2011-2012 school year

Two possible ways to include an extended-year graduation rate in determining whether a school meets the other academic indicator for AYP calculations are outlined below. Please note that these are examples and do not represent all the ways a State might include an extended-year graduation rate in AYP calculations. We encourage States to contact the Department with any specific questions or requests for technical assistance related to calculating AYP with an extended-year graduation rate.

- A State could set separate annual targets (but have the same goal) for the four-year graduation rate and the extended-year graduation rate. The State would first examine whether a school or LEA met the goal or the targets for the four-year graduation rate. If it did not, the State could then determine whether the school or LEA met the extended-year graduation rate targets. Meeting the goal or the targets for either of the rates would mean that the school or LEA met the other academic indicator for AYP. The Department expects that States using such a methodology will set aggressive targets, including more aggressive targets for the extended-year rate than for the four-year rate.
- A State could combine its extended-year graduation rate with the four-year graduation rate and compare the combined graduation rate with the State's goal and annual targets to determine if a

school or LEA met the other academic indicator in calculating AYP. For example, a State that includes a five-year extended-year graduation rate in its AYP determinations might assign the four-year graduation rate 80 percent of the weight and the five-year graduation rate 20 percent of the weight. If a school's four-year graduation rate is 62 percent and its five-year graduation rate is 68 percent, the weighted rate would be:

$$\text{Weighted rate} = [(.80 * 62.0) + (.20 * 68.0)] = 63.2$$

A weighted rate would be calculated for each subgroup. The State would then compare the weighted rates (e.g., 63.2 percent at the school level) with the State's graduation rate goal and annual targets to determine if the school, in the aggregate and each subgroup, met the other academic indicator for AYP. For States that use such a weighted rate, the Department anticipates approving only rates that give the predominant weight to the four-year graduation rate. The Department strongly encourages any State using such a weighted rate to give predominant weight to the four-year rate.

What does it mean to make “progress on one or more of the academic indicators” in order to make AYP through “safe harbor”?

Under section 1111(b)(2)(I) of the ESEA, if a subgroup, school, or LEA does not meet or exceed the State's annual measurable objective in reading/language arts or mathematics in a given year, the subgroup, school, or LEA may make AYP if (1) the percentage of students who were not proficient in that year decreased by at least 10 percent from the prior year and (2) the subgroup, school, or LEA made “progress on one or more of the academic indicators described in [section 1111(b)(2)(C)(vi) or (vii)]” (“safe harbor”). “Progress” on the other academic indicator is determined by a State's implementation of the requirements in 34 C.F.R. §200.19.

- Other academic indicator for elementary and middle schools: a State may, but is not required to, increase over time the goals of its other academic indicators for elementary and middle schools. If a State sets goals that increase over time, a subgroup, school, or LEA may make AYP through “safe harbor” only if it meets or exceeds the requisite increase as defined by the State. On the other hand, if a State does not require a specific increase, a subgroup, school, or LEA may make AYP through “safe harbor” if it demonstrates “progress” from the prior year on the other academic indicator.
- Other academic indicator for high schools: “Making progress” on the other academic indicator for high schools means meeting or exceeding the State's graduation rate goal or annual targets. This is because 34 C.F. R. §200.19(b)(3) requires a State to set (1) a single graduation rate goal that represents the rate the State expects all high schools to meet and (2) annual graduation rate targets

that reflect continuous and substantial improvement from the prior year toward meeting or exceeding the State's graduation rate goal. Accordingly, a subgroup, school, or LEA must meet or exceed the State's graduation rate goal or annual targets in order to make AYP through "safe harbor."

When must a State include disaggregated graduation rates in AYP determinations?

A State must include disaggregated graduation rates in AYP determinations beginning with determinations based on assessments administered in the 2011-2012 school year. If a State is not able to calculate the four-year graduation rate by 2011-2012, it must disaggregate data for its transitional graduation rate for use in AYP determinations. If a State chooses to implement the four-year graduation rate before the deadline, it is not required to disaggregate data using the four-year graduation rate for AYP determinations until the 2011-2012 deadline.

Why is it important to disaggregate graduation data for AYP purposes?

Nearly six years after the implementation of NCLB, we now know that simply reporting disaggregated graduation rate data is not sufficient to address the problem of wide disparities in graduation rates among different student subgroups. We believe schools and LEAs must be held accountable for the differences in graduation rates among subgroups. Just as disaggregating assessment results helps ensure that high performance by the "all students" group does not mask low performance by subgroups of students, disaggregating graduation rate data helps to ensure that a high graduation rate among the "all students" group does not mask low graduation rates among certain student subgroups.

How have the 2008 Title I regulations changed the requirements for disaggregating graduation rate data?

Prior to the 2008 Title I regulations, a State was required to disaggregate graduation rate data for reporting purposes under section 1111(h) of the ESEA, when calculating safe harbor under 34

If the State included additional other academic indicators in AYP under section 1111(b)(2)(C)(vii) of the ESEA. However, disaggregated graduation rate data were not required to be included in the so-called "status" model for AYP calculations. Under the 2008 Title I regulations, a State also must disaggregate graduation rate data for determining AYP for all high schools, LEAs, and the State beginning with AYP determinations based on assessments administered during the 2011-2012 school year.

Must States disaggregate graduation rate data for the "other academic indicator" used in making AYP determinations for the same subgroups that are used in AYP proficiency determinations?

Yes. The regulations require disaggregation of graduation rate data for the same subgroups that are used to determine whether students in various subgroups have achieved proficiency. The subgroups for which

graduation rate data must be disaggregated are the following: economically disadvantaged students; students from major racial and ethnic groups; students with disabilities, as defined in section 9101(5) of the ESEA; and LEP students, as defined in section 9101(25) of the ESEA. (See question C-3.)

Must data for an extended-year graduation rate be disaggregated?

Yes. If a State chooses to use an extended-year graduation rate, that rate must be disaggregated by subgroups for reporting and for AYP determinations.

May a State apply a minimum group size for including graduation rate in AYP determinations?

Yes. a State determine the minimum number of students sufficient to yield statistically reliable information for each purpose for which disaggregated data are used and to protect the privacy of individual students. States may have different minimum group sizes for different purposes. For instance, a State's minimum group size for reporting might be lower than its minimum group size for proficiency because it has a different purpose. The purpose of the minimum group size for reporting is to protect the privacy of individual students, whereas the purpose of the minimum group size for proficiency is to provide reliable proficiency information while ensuring the maximum inclusion of all students and student subgroups in AYP determinations. Because graduation rates must be disaggregated for AYP calculations, a State may apply a minimum group size in order to guard against a school not making the other academic indicator in determining AYP because of fluctuations in data that can result when AYP is calculated based on the performance of a small number of students. For example, if only five students are enrolled in grade 12 in a small, rural high school and the State's graduation rate goal is 85 percent, every member of the cohort would need to graduate on time for the school to meet the State's graduation rate goal. The minimum group size mitigates against minor year-to-year fluctuations in data when there are very small numbers of students in the student body in general, or its subgroups, causing a school or LEA to not make AYP. A State must also apply a minimum group size for reporting graduation rates to protect the privacy of individual students.

Are there any limits to the minimum group size for graduation rate?

The Department does not expect to approve a State's minimum group size for graduation rate that is larger than the minimum group size for its assessment participation rate. Similar to participation rate, graduation rate is a count and is not sensitive to measurement error. However, it is sensitive to fluctuations in very small cohorts of students. As such, the Department believes it is appropriate to permit a minimum group size for graduation rate that is the same as or less than the minimum group size used with participation rates. The Department, however, does not believe a State's minimum group size for graduation rate should exceed the minimum group size for its participation rate.

Will the Department approve the use of confidence intervals to determine whether a high school or LEA meets the other academic indicator (i.e., graduation rate)?

No. The Department does not believe that it is appropriate to use a confidence interval with graduation rate because the graduation rate is not based on a sample of a school's population; it is based on the full population of a given cohort in the school.

Will the Department permit a State to average graduation rate data across years in making AYP determinations?

Yes. Section 1111(b)(2)(J) of the ESEA permits a State to use an average of data over two or three years and thereby minimize annual variations in data, particularly those involving very small populations that may lead a school or LEA not to make AYP. Thus, a State may average graduation rate data across years in making AYP determinations. A State may either (a) average graduation rate data for the school year for which the determination is made with data from one or two school years immediately preceding that school year, or (b) choose the highest graduation rate from among the rate for the current year or from the two or three year average when determining whether the school or LEA has met the other academic indicator for AYP determinations.

While the statute allows flexibility to average data across years for making AYP determinations, it is important to note that, for reporting purposes, States and LEAs must report on their report cards the graduation rate for the current year without averaging, unless the number of students in that rate is below the State's minimum group size for reporting purposes.

Does the "full academic year" provision apply to graduation rate?

No. Under section 1111(b)(3)(C)(xi) of the ESEA, a State may not include in AYP determinations the assessment results of students who have not been enrolled in a single school or LEA for a "full academic year." Thus, each State has defined "full academic year," typically by some number of days or months between a date certain and the testing window. The concept of "full academic year," both by its placement in the statute under the assessment requirements, and logically, does not apply to graduation rate. Earning a diploma is a multi-year process, and the four-year and extended-year graduation rates follow cohorts of students over four or more years. These rates intentionally account for students moving in and out of a school. Thus, calculating graduation rates is inconsistent with the concept of a student's placement in a single grade for a "full academic year."

Workbooks

The Maine DOE has created an Excel workbook which you may use to calculate your own graduation rate and also perform “what if” scenarios to assist you in planning. This workbook can be downloaded from here:

http://www.maine.gov/education/enroll/grads/gradrate_workbook.xls

APPENDIX A

Validation and certification of students who transfer-in and transfer-out of the 2008-09 cohort

In addition to the Completers and Dropouts certifications, schools must now also certify which students are transferred into the cohort and which students are transferred out of the cohort. Only school administrative units that have schools that graduate secondary students need to review and certify this report. To accomplish this, each student must have a properly coded End Status as well as a properly coded Start Status within the Infinite Campus State Edition (ICSE).

The following chart lists the available choices in the End Status dropdown from within Infinite Campus State Edition (ICSE) and its Transfer determination.

Maine Codes	Definition	Classification
01	Transfer to public school in the same SAU	Transfer Out
02	Transfer to ME public school in different SAU	Transfer Out
03	Transfer to public school in a different state	Transfer Out
04	Transfer to priv. non-religious school, same SAU	Transfer Out
05	Transfer to ME priv. non-religious, different SAU	Transfer Out
06	Transfer to priv. non-religious, out-state	Transfer Out
07	Transfer to priv. religious school within SAU	Transfer Out
08	Transfer to ME priv. religious, different SAU	Transfer Out
09	Transfer to priv. religious, different state	Transfer Out
10	Transfer to school outside of the country	Transfer Out
11	Transfer to an institution	Transfer Out
12	Transfer to a charter school	Transfer Out
13	Transfer to home schooling	Transfer Out
14	Matriculation to another school	Transfer Out
15	Graduated with regular, advanced diploma	Graduated (NCLB)
16	Completed school with other credentials	Other Completer (NGA)
17	Death	Remove from cohort
18	Illness	Remove from cohort
19	Expulsion	Remove from cohort
20	Reached maximum age for services	Remove from cohort
21	Discontinued schooling	Dropout
23	Transfer to GED program	Dropout
24	Transfer to a postsecondary education	Transfer Out
25	Moved, not known to be continuing	Dropout
97	Reason Unknown	Dropout
99	Other	Dropout
98	Close of Year	Transfer Out/ Dropout

Reference: www.maine.gov/education/medms/data/exittype/exittypescodes.htm

The following chart lists the available choices in the Start Status dropdown from within Infinite Campus State Edition (ICSE) and its Transfer determination.

Start Code	Start Status	Start Status Description	Transfer-In
01	New to educational system	given when entering school for the first time as in kindergarten or pre-kindergarten	NO
02	Continuous in same school w/ no interruption		NO
10	Grade reassignment within same school		NO
11	Transfer from pub school in same district		YES
12	Transfer from a non-district site		YES
13	Transfer from a pub school in different district		YES
14	Transfer from a different state/country		YES
15	Transfer from a non-public school		YES
16	Transfer from home-based education		YES
17	Transfer from GED program		YES
18	Transfer from Voc program		YES
19	Transfer from State facility on-grounds school	transfer from a Maine correctional facility	YES
30	Re-entry to district after voluntary withdrawal	re-entry after withdrawal from a different district	YES
40	Re-entry after dropping out from same district	re-entry after withdrawal from same district	YES
50	Re-entry after expulsion from same district		YES
99	Maine default	do not use this code any longer	